



ORIGINAL

October 25, 1995

Mr. William Caton
Acting Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, DC 20554

OCT 25 1995

Re: IB Docket No. 95-117

DOCKET FILE COPY ORIGINAL

Dear Mr. Caton:

Transmitted herewith are an original and five (5) copies of the "Reply Comments of Iridium, Inc." in the above-referenced proceeding.

Should any question arise concerning this matter, please communicate with this office.

Very truly yours,

Patricia A. Mahoney
Patricia A. Mahoney, Esq.
Senior Manager, Licensing Affairs

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ORIGINAL

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

OCT 25 1995

In the Matter of) IB Docket No. 95-117
)
Streamlining the Commission's)
Rules and Regulations for Satellite)
Application and Licensing Procedures)

DOCKET FILE COPY ORIGINAL

Directed to: The Commission

REPLY COMMENTS OF IRIDIUM, INC.

Iridium, Inc. (Iridium) hereby respectfully submits these reply comments in response to comments filed by various parties in the above-captioned proceeding:

**Iridium Generally Supports
The Commission's Streamlining Efforts**

Although it did not submit comments in this proceeding, Iridium supports and appreciates the efforts of the Commission, as reflected in the Notice of Proposed Rulemaking, FCC 95-285 (released Aug. 11, 1995)(NPRM), to revise and "streamline" the Commission's satellite application and licensing procedures. Iridium supports the Commission's activities and objectives to eliminate unnecessary regulatory requirements and burdens on the communications satellite industry.

Information That Is Unnecessary to the Commission's Application and Licensing Processes Should Not Be Required, Requested, and/or Collected

Iridium agrees with the Commission and a number of the commenters (AT&T Corp., PanAmSat Corporation, CTA Incorporated, Hughes Communications Galaxy,

Inc. and others) that the Commission should not require the submission of information in the application process that is unnecessary to the licensing process, particularly where such information would otherwise be treated as confidential, proprietary, and/or highly sensitive in the competitive satellite industry. Iridium agrees that information such as the estimated demand for the services and the entities to be served and an estimate of transponder capacity under each of the proposed operating conditions should not be requested and collected by the Commission when it is not even used by or useful to the Commission in the licensing process. Iridium encourages the Commission to continue to review its regulations and procedures to identify and eliminate additional requirements for information that is not necessary to the application licensing process.

**Iridium Agrees That One Application Form Should Be Utilized
for the Satellite Services**

Iridium also agrees with the majority of the commenters who supported the Commission's long overdue proposal to adopt one specific application form (FCC Form 312) for satellite applications. Iridium agrees with the comments of Motorola Satellite Communications, Inc. (Motorola) that the proposed Form 312 should be further refined to eliminate "narrative" requirements. The Commission's streamlining goals would best be served by one form that requests on its face all of the information needed for satellite system and space station applications so that completion of the form represents a minimally acceptable application.

The Commission Should Apply All Reforms Adopted to the Next Round or Group of Satellite Applications Filed

So that these proposed reforms can truly be of benefit to the industry and save the resources of the Commission and the applicants, Iridium urges the Commission not to open another filing window for satellite applications until it has adopted the new form and the new "streamlined" procedures and to apply the new, streamlined procedures to the next round or processing group. For the same reason, Iridium urges the Commission not to open another window and invite the filing of additional satellite applications until it has concluded its comprehensive review of the FCC's satellite licensing policies, announced in the Public Notice, "International Bureau to Review Satellite Licensing Policies," Report No. IN 95-25 (released Sept. 20, 1995), and adopted any reforms proposed to be adopted as a result of that review.

The Commission Should Not Adopt the Final Report of the RTCA Working Group and/or the Out-of-Band Emission Limits for MSS Without First Conducting a Notice and Comment Rulemaking Proceeding

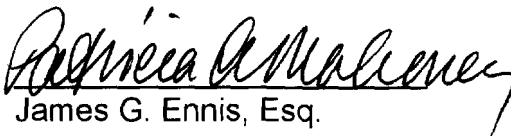
Iridium agrees with the views expressed by the comments of Hughes Network Systems, Inc. (HNSI) and Loral/Qualcomm Partnership, L.P. (Loral) concerning the Commission's announced intention to adopt the final report and recommendations from RTCA, Inc. (RTCA) on out-of-band emission standards for MSS. According to the NPRM, the Commission has not yet even received the final report. Thus it is premature for the Commission to propose (as it gave notice it would in the NPRM) to adopt the recommendations of the RTCA. Iridium agrees with HNSI and Loral that, before the RTCA recommendations can be adopted by the FCC as a rule or policy, they must be

considered through a notice and comment rulemaking proceeding.

Conclusion

As the Commission's International Bureau has concluded, and as the comments filed in this proceeding generally reflect, there is a definite need for streamlining of the Commission's satellite application and licensing procedures. The NPRM proposes some initial reforms and refinements that will eliminate some of the unnecessarily burdensome requirements in the process. It is likely that other proposals will be generated through the Commission's licensing policies proceeding. Iridium hopes that the Commission will continue its efforts to review its procedures and policies, eliminate unnecessary requirements, and establish/retain procedures and policies that bring service to consumers expeditiously.

Respectfully submitted,
IRIDIUM, INC.

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October 25, 1995

CERTIFICATE OF SERVICE

I, Patricia A. Mahoney, hereby certify that I have this 25th day of October, 1995, sent by first-class U.S. mail, postage prepaid, copies of the foregoing to:

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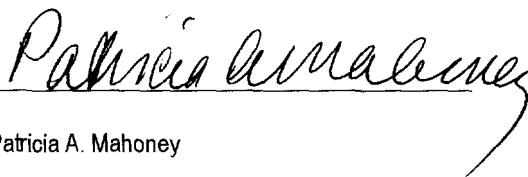
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